

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Cable Television Technical and Operational)	MB Docket No. 12-217
Requirements)	
)	

MOTION FOR EXTENSION OF TIME TO FILE REPLY COMMENTS

Pursuant to 47 C.F.R. § 1.46, the National Association of Telecommunications Officers and Advisors (“NATOA”) requests an extension of time to file reply comments in the above-captioned proceeding. Reply comments are currently due January 7, 2013. NATOA respectfully request an extension through and including February 8, 2013. Granting this extension will serve the public interest and allow a more complete record to be developed in this matter.

DISCUSSION

While it is “the policy of the Commission that extensions of time shall not be routinely granted,”¹ such extensions are warranted when, among other things, the additional time will serve the public interest.² Here, an extension through and including February 8, 2013, would serve the public interest.

¹ 47 C.F.R. § 1.46(a).

² See, e.g., *In the Matter of 1998 Biennial Regulatory Review — Streamlining of Radio Technical Rules in Parts 73 and 74 of the Commission's Rules*, 13 FCC Rcd. 13513 (July 23, 1998).

A. An Extension Will Allow NATOA To Have Discussions With NCTA and Others In An Attempt To Narrow Differences in Their Proposals.

In their opening comments, both NATOA and NCTA provided specific proposals for revising the rules proposed by the Commission. The Commission should grant an extension to allow time for technical experts from NATOA and NCTA and other filers to discuss the differences in their proposals and attempt to resolve those differences. NCTA been contacted and has indicated it will not oppose this request for an extension.

B. An Extension May Allow for Development of a More Thorough Record.

Several industry commenters questioned whether there was a need for new rules and suggested that there is no record of problems or complaints to support the need for new rules. As noted in its comments, NATOA members have received numerous complaints from subscribers about digital service. More time for reply comments would enable NATOA and its members to provide more evidence of these complaints for the record. However, with the current January 7th reply deadline, it would be difficult for local governments to provide this information in reply comments.

C. An Extension Is Appropriate Due to the Holiday Period That Will Make Filing by January 7th Difficult.

Finally, during the holiday period in December and early January, NATOA and its members and technical consultants will have limited abilities to review the comments filed on December 10th and assemble reply comments. Moving the reply comment deadline to a date further after the holiday period will allow reply comments to be developed that will assist the Commission.

CONCLUSION

For the above reasons, NATOA requests that the Commission extend the deadline for reply comments in this matter from January 7th to February 8th.

Respectfully submitted,

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